

# **THE SALTERS' COMPANY GROUP**

## **Safeguarding Policy and Procedures**

**October 2021**

**Document status:** Under review

**Prepared by:** Outgoing Head of Education and Designated Safeguarding Lead (DSL).

**Reviewers:** Clerk, Tim Smith; Acting DSL.

**Approved by:** Institute Board and Court of Assistants

**Implementation date:** Ongoing

**Review date:** May 2024

**Current Version:** 3 – Updated 21 October 2021

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### **Appendix 1**

Form for reporting an allegation or a disclosure

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Agreement and Signature Document

## **1. Safeguarding key contacts**

**The Acting Designated Safeguarding Lead (DSL) is the Clerk.**

Tim Smith

Email: [clerk@salters.co.uk](mailto:clerk@salters.co.uk)

Mobile: 07769 977818

The Salters' Company

Salters' Hall

4 London Wall Place

London

EC2Y 5DE

**If you have a safeguarding concern or have received an allegation or disclosure, please contact the Acting Designated Safeguarding Lead immediately.**

**Should the concern, allegation or disclosure relate to the Acting DSL, this should be reported immediately to the Master | 020 7588 5216 Ext. 216).**

**If you think a child, young person or adult is at risk of immediate harm, please call 999.**

**The Company is also identifying a suitable Deputy DEL; details to be confirmed asap.**

## 2. Safeguarding organisational and governance leads

The organisational lead for Safeguarding for the Salters' Company is:

Name: Tim Smith

Position: Clerk

Email: [tim.smith@salters.co.uk](mailto:tim.smith@salters.co.uk)

Telephone: 020 7588 5216 Ext. 216

The organisational lead for Safeguarding on the Salters' Institute Board is:

Name: Hannah Jenkins

Position: Board Member

Email: [safeguardinggovernance@saltersinstitute.org](mailto:safeguardinggovernance@saltersinstitute.org)

The organisational lead for Safeguarding on the Court of Assistants (Trustee) is

Name: Matthew Previte

Position: Court Assistant

Email: [safeguardinggovernance@saltersinstitute.org](mailto:safeguardinggovernance@saltersinstitute.org)

### The Governance Leads:

1. are aware of their legal duties and responsibilities:
  - i. <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>
  - ii. [https://www.bond.org.uk/sites/default/files/resource-documents/good\\_governance\\_for\\_safeguarding.pdf](https://www.bond.org.uk/sites/default/files/resource-documents/good_governance_for_safeguarding.pdf);
2. have regular meetings with the DSL;
3. serve as a conduit between the Executive and the Institute Board and Court of Assistants;
4. provide safeguarding updates to the Institute Board and Court of Assistants;
5. ensure that safeguarding is on the Salters' Group's risk registers;
6. attend annual safeguarding training; and
7. maintain and review their knowledge through reading regular updates on legislation and guidance provided by the DSL.

### **3. Purpose and scope**

3.1 The Safeguarding Policy and Procedures applies to the Salters' Company Group comprising:

- a. The Worshipful Company of Salters (the Livery Company)
- b. The Salters' Management Company Limited,
- c. The Salters' Institute of Industrial Chemistry,
- d. The Salters' Charitable Foundation
- e. The Almshouse Charities of Nicholas & Beamond and James Smith

3.2 The Safeguarding Policy and Procedures:

- a. provides up to date and relevant information and guidance for Salters' staff, Members, volunteers, partners, consultants, freelancers and agencies contracted by the Salters' Company Group;
- b. are especially relevant to those who will be working directly with and or who will be in contact with children (whether only once or more frequently), young people and adults at risk of harm;
- c. presents the company's policies and procedures in one place and in a coherent manner; and
- d. ensure that all members of staff, Governance Leads and relevant Members are able to sign Appendix 2 to confirm their adherence to and understanding of company policies and procedures.

3.3 By reading the Safeguarding Policy and Procedures, Salters' staff, Members, volunteers, partners, consultants, freelancers and agencies contracted by the Salters' Company understand that it is their responsibility to:

- a. be informed about current legislation;
- b. understand the policies and procedures surrounding safeguarding; and
- c. be ready to respond appropriately and quickly to any safeguarding concerns.

3.4 The policy is relevant to all of the Salters' Group and the work it delivers, commissions and funds.

## 4. Policy statement and principles

The Salters' Group:

4.1 believes that safeguarding is everyone's responsibility. It is a part of our professional responsibility to:

- a. be informed about current legislation;
- b. understand the policies and procedures surrounding safeguarding; and
- c. be ready to respond appropriately and quickly to any safeguarding concerns.

4.2 believes that everyone has a responsibility to promote the welfare of all children, young people and adults at risk of harm, to keep them safe and to work in a way that protects them.

4.3 believes that the safeguarding of children, young people and adults at risk of harm is paramount.

4.4 is committed to equality, diversity and inclusion, and to anti-discriminatory practice. The Group will, therefore, give equal priority to keeping all children, young people and adults at risk of harm safe, regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

4.5 recognises the additional needs of children from minority ethnic groups and disabled children and the barriers they may face, for example, with communication or the impact of discrimination.

4.6 will ensure that we meet our commitment to keeping children, young people and adults at risk of harm safe by:

- a. listening to children and respecting them;
- b. appointing a Designated Safeguarding Lead and a member of the Court who takes lead responsibility for safeguarding at the highest level in the organisation;
- c. writing detailed safeguarding procedures;
- d. making sure all staff, Members and volunteers understand and follow the safeguarding procedures;
- e. ensuring children, young people, adults at risk of harm, and their families know about the organisation's safeguarding policy and what to do if they have a concern, allegation or disclosure; and
- f. building a safeguarding culture in which the following know how they are expected to behave and feel comfortable about sharing concerns:
  - children
  - young people
  - adults at risk of harm

- staff
- Members
- Volunteers
- Partners
- Consultants, freelancers and agencies contracted by the Salters' Group

4.7 will adhere to its principles for safeguarding:

- a. commitment to promoting a safe and respectful environment for the children, young people and adults at risk of harm with whom it [the Salters' Group] works;
- b. understanding and adherence to the Child Protection and Safeguarding policies of institutions and organisations with which it works;
- c. careful and safe recruitment of staff, volunteers, consultants, freelancers and agencies;
- d. support through training and resources for staff, governance leads, and volunteers;
- e. prompt, professional and ethical response to every safeguarding concern raised about a child, young person or adult at risk of harm and cooperation with the statutory and all other relevant authorities; and
- f. promoting safeguarding as everyone's responsibility.

The policy should be read alongside:

- the Employee Handbook (July 2021)
- Privacy and GDPR Policies
- Any safeguarding policy provided by an institution / partner with which the Salters' Group is working



## **5. Wider context**

The Safeguarding Policy and Procedures of the Salters' Company Group sits within and alongside the wider context of safeguarding policies, procedures and guidance. This includes but is not limited to:

### **GOVERNMENT LEGISLATION AND GUIDANCE**

#### **Children Act 1989**

<http://www.legislation.gov.uk/ukpga/1989/41/contents>

#### **Children Act 2004**

[http://www.legislation.gov.uk/ukpga/2004/31/pdfs/ukpga\\_20040031\\_en.pdf](http://www.legislation.gov.uk/ukpga/2004/31/pdfs/ukpga_20040031_en.pdf)

#### **Mental Capacity Act 2005**

<https://www.legislation.gov.uk/ukpga/2005/9/contents>

#### **Children and Families Act 2014**

[http://www.legislation.gov.uk/ukpga/2014/6/pdfs/ukpga\\_20140006\\_en.pdf](http://www.legislation.gov.uk/ukpga/2014/6/pdfs/ukpga_20140006_en.pdf)

#### **Working Together to Safeguard Children (July 2018)**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/942454/Working\\_together\\_to\\_safeguard\\_children\\_inter\\_agency\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf)

#### **Care Act (2014)**

<https://www.legislation.gov.uk/ukpga/2014/23/contents>

#### **Counter-Terrorism and Security Act 2015 (Updated 1 April 2021)**

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

#### **Keeping Children Safe in Education (September 2021)**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1020050/KCSIE\\_2021\\_September\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1020050/KCSIE_2021_September_guidance.pdf)

### **CHARITABLE SECTOR**

#### **Charity Commission**

<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

#### **NSPCC**

<https://learning.nspcc.org.uk/safeguarding-child-protection>

<https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment>

**Safeguarding Adults – Social Care Institute for Excellence (SCIE)**

<https://www.scie.org.uk/safeguarding/adults/introduction/what-is>

**Safeguarding Adults – Age UK**

<https://www.ageuk.org.uk/globalassets/age-uk/documents/policy-positions/health-and-wellbeing/adult-safeguarding-policy-position-nov-2018-final.pdf>

**LONDON AND CITY OF LONDON CORPORATION**

**The London Safeguarding Children Board Procedures**

<https://www.londoncp.co.uk/>

**The London Safeguarding Adults Board Policy and Procedure**

<http://londonadass.org.uk/wp-content/uploads/2019/05/2019.04.23-Review-of-the-Multi-Agency-Adult-Safeguarding-policy-and-procedures-2019-final-1-1.pdf>

**Safeguarding Children and Young People from the City of London and Hackney  
Safeguarding Children’s Partnership**

<http://www.chscb.org.uk/>

**The City of London and Hackney Safeguarding Adults Board**

<https://hackney.gov.uk/safeguarding-adults-board>

**The City of London Corporation Threshold of Need**

<https://www.cityandhackneyccg.nhs.uk/Downloads/gp/Practice%20support/Safeguarding%20Children/Thresholds-of-need.pdf>

## **6. Roles and Responsibilities of Designated Safeguarding Lead (DSL)**

### **Purpose of the role**

To take the lead in ensuring that appropriate arrangements for keeping children, young people, and adults at risk of harm, safe are in place at the Salters' Group.

To promote the safety and welfare of children, young people, and adults at risk of harm, involved in the Salters' Group activities and events at all times.

### **Duties and responsibilities**

1. Act as named person and point of contact for all matters related to safeguarding both within the Salters' Group and externally.
2. Take a lead role in developing and reviewing the Salters' Group's safeguarding policies and procedures.
3. Take a lead role in implementing the Salters' Group's safeguarding policies and procedures: ensuring all safeguarding concerning children, young people, and adults at risk of harm who take part in the Salters' Group activities and events are responded to promptly, ethically and appropriately.
4. Advise and support the Senior Management Team and Governance Leads in developing and establishing the Salters' Group's approach to safeguarding.
5. Play a lead role in establishing, maintaining and reviewing the Salters' Group's plan for safeguarding.
6. Advise on training needs and development, providing training where appropriate.
7. Provide safeguarding advice and support to Salters' staff, Members and volunteers.
8. Make sure that everyone working or volunteering with or for children, young people and adults at risk of harm at the Salters' Group including the Institute Board and Court of Assistants (Trustee) understands the safeguarding policy and procedures, and knows what to do if they have concerns about a child's, young person's or adult at risk of harm's welfare.
9. Work closely with the Institute Board and Court of Assistants (Trustee) and Governance Leads to ensure they are kept up to date with safeguarding issues and are fully informed of any concerns about organisational safeguarding practice.
10. Make sure children, young people and adults at risk of harm, and their carers, who are involved in activities and events at the Salters' Group know who they can talk to if they have a welfare or safeguarding concern and understand what action the organisation will take in response.
11. Receive and record information from anyone who has concerns about a child, young person, or adult at risk of harm, who takes part in the Salters' Group's activities.
12. Take the lead on responding to information that may constitute a safeguarding concern, including a concern that an adult involved with the Salters' Group may present a risk to children or young people. This includes:
  - a. assessing and clarifying the information;
  - b. making referrals to statutory organisations as appropriate;
  - c. consulting with and informing the relevant members of the Salters' Group management; and

- d. following the organisation's safeguarding policy and procedures.
- 13. Liaise with, pass on information to, and receive information from statutory child protection agencies such as the local authority child and adult protection services and the police. This includes making formal referrals to agencies when necessary.
- 14. Manage referrals to key safeguarding agencies (e.g., local safeguarding partnership or the police) of any incidents or allegations of abuse and harm.
- 15. Store and retain safeguarding records according to legal requirements and the Salters' Group's safeguarding policy and procedures.
- 16. Report regularly to the Institute Board and Court of Assistants (Trustee) on issues relating to safeguarding to ensure that it is seen as an ongoing priority issue and that safeguarding requirements are being followed at all levels of the Salters' Group.
- 17. Be familiar with and work within inter-agency child and adult protection procedures developed by the local child and adult protection agencies.
- 18. Be familiar with issues relating to safeguarding and abuse, and keep up to date with new developments in this area.
- 19. Attend regular training in issues relevant to child protection and share knowledge from that training with everyone who works or volunteers with or for children, young people and adults at risk of harm at the Salters' Group.
- 20. Attend team meetings, supervision sessions and management meetings as arranged.
- 21. Work flexibly as may be required and carry out any other reasonable duties.

#### **Deputy DSL**

**In the absence of the Designated Safeguarding Lead, the Deputy DSL will take on the above responsibilities.**

## 7. Overview and definitions

- 7.1 Everyone has a responsibility to safeguard children, young people and adults at risk of harm regardless of their role within, or relationship with, the Salters' Group.
- 7.2 Each organisation within the Salters' Group needs to recognise and be aware of how their staff, Members, volunteers, partners, consultants, and or contracted freelancers and agencies interact and work with children, young people and adults at risk of harm. This includes the provision of relevant and appropriate training on safeguarding and creating safe spaces and working practices.
- 7.3 Salters' Group staff, Members, volunteers especially should be able to recognise potential dangers and risks and report any safeguarding concerns to the Designated Safeguarding Lead (DSL) or Deputy DSL.
- 7.4 The Designated Safeguarding Lead and or Deputy DSL will work with the relevant and appropriate statutory organisations and bodies to report and refer safeguarding concerns and disclosures.
- 7.5 Safeguarding is a serious and important commitment. The significance of safeguarding to the organisations within the Salters' Group is reflected in its inclusion in Risk Registers and in the creation, adoption, and regular review of this policy.
- 7.6 For the Salters' Group Safeguarding Policy and Procedures to be effective, all organisations, staff, volunteers and Members within the Salters' Group need to have:
- an applied understanding of safeguarding and key definitions;
  - an awareness of the signs and symptoms of potential harm and or abuse;
  - how to assess, record and report a safeguarding concern, allegation or disclosure; and
  - an applied understanding of the next steps following the submission of a safeguarding concern, allegation or disclosure.

**Below are some examples of situations and scenarios in which awareness of safeguarding should be paramount. The organisational safeguarding culture, however, underlines the importance of safeguarding at all times and in all encounters with children, young people and adults at risk of harm, whether in person or online:**

1. Visiting or attending any Salters' Group activity or event at which children and young people may be present (e.g. Festivals of Chemistry, Chemistry Camps, Scholars' Evening), whether in person or online.

2. Visiting or attending a site owned or hired by the Salters' Group at which adults at risk of harm may be present (e.g. visit to an Almshouse or to one of the Salters' Charitable Foundation projects and beneficiaries – other charities and educational institutions), whether in person or online.
3. Acting in a supervisory or mentoring role (e.g. as Master Apprenticeship and or a mentor to Salters' alumni), whether in person or online.
4. Engaging in communications with beneficiaries of the Salters' Group's charities, whether in person or online.

## **Definitions**

Abuse, in its different forms, and neglect are clearly defined in this policy. These definitions are not exhaustive, but they are widely recognised and accepted, and can therefore be used to identify when a child/ adult is at risk of harm, or experiencing harm or abuse.

### **Abuse (See below for specific forms)**

Child abuse is any action by another person – adult or child – that causes significant harm to a child (NSPCC). This can be the result of directly inflicting harm or failing to act to prevent harm.

### **Abuser**

An abuser can be any member in society and can come from all walks of life. An abuser can be male or female, of any class, religion, race, ethnicity, or nationality. Abuse may be sometimes be carried out by strangers, but it is much more common that the abuser is known to the child and is in a position of trust and/or authority. It is not only adults who abuse children; children may suffer abuse from other children and young people. COA Staff and members of the interview team should be aware that abusers may include:

- some adults who are unable to provide consistent care to a child or young person;
- some adults, including professionals, who manipulate themselves into a position of trust where they can exploit children and young people in many forms (physically, emotionally / psychologically, sexually);
- some adults, including professionals who, by consistently behaving inappropriately towards children and young people, can cause them to suffer physical or emotional harm; and
- some children or young people, who themselves may be victims of abuse.

### **Adult at Risk of Harm**

According to the Care Act 2014, an adult at risk of harm:

- a. has needs for care and support (whether or not the authority is meeting any of those needs);
- b. is experiencing, or is at risk of, abuse or neglect; and
- c. as, a result of those needs, is unable to protect himself or herself against the abuse or neglect or the risk of it.

### **Bullying and Cyberbullying**

Bullying can mean different things (Childline) and can occur in person, online or through a phone or other device:

- being called names
- being teased, put down or humiliated
- being pushed or pulled about
- having money and other belongings taken
- having rumours spread about you

- being ignored and left out
- being hit, kicked or physically hurt
- being threatened or intimidated

**Bullying can also be part of other forms of abuse, including neglect, emotional, physical, and sexual abuse.**

### **Cyberbullying**

Cyberbullying is using the internet, email, online games or any digital technology to threaten, tease, upset or humiliate someone else (Childline).

### **Child**

In this document a child is defined as anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection (HM Government).

### **Child Criminal Exploitation (CCE)**

This is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited, even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology (HM Government).

### **Child Trafficking**

Child trafficking is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold (NSPCC).

### **County Lines**

A term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons (HM Government).

### **Domestic Abuse**

An incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer (Women's Aid). The NSPCC (National Society for the Protection of Children) makes clear that witnessing Domestic Abuse is child abuse.



### **Emotional Abuse**

Emotional abuse is the ongoing emotional maltreatment of a child. It's sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. Children who are emotionally abused are often suffering another type of abuse or neglect at the same time – but this isn't always the case (NSPCC). Adults can also suffer and be victims of emotional abuse.

### **Female Genital Mutilation (FGM)**

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done (NHS).

### **Grooming**

Children and young people can be groomed online or in the real world, by a stranger or by someone they know - a family member, friend or professional (NSPCC).

### **Neglect**

Neglect is the ongoing failure to meet a child's basic needs (NSPCC).

### **Online Abuse**

Online abuse is any type of abuse that happens on the internet, whether through social networks, playing online games or using mobile phones or other devices (NSPCC).

### **Physical Abuse**

Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts (NSPCC).

### **Sexual Abuse**

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (Her Majesty's Government, 2015 - NSPCC).

### **Young Person**

There is no legal definition of the term 'young person', but it is often considered to refer to those under the age of 25.

## 8. Safeguarding children and young people

8.1 Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes (HM Government).

**8.2 Any concerns, allegations or disclosures that children may be suffering significant harm should be raised with the Designated Safeguarding Lead (DSL) or Deputy DSL using the form in Appendix 1.** This can be done in person, through a telephone call and or an email marking the subject line 'CONFIDENTIAL – SAFEGUARDING CONCERN/ALLEGATION/DISCLOSURE'. There is a duty of care and legal responsibility to respond to safeguarding concerns, allegations, disclosures and incidents.

8.3 The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children (HM Government).

8.4 With regards to consent for information sharing, it is not necessary to seek consent to share information for the purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required. The legal bases that may be appropriate for sharing data in these circumstances could be 'legal obligation', or 'public task' which includes the performance of a task in the public interest or the exercise of official authority. Each of the lawful bases under GDPR has different requirements. It continues to be good practice to ensure transparency and to inform parent/ carers that you are sharing information for these purposes and seek to work cooperatively with them.

([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/942454/Working\\_together\\_to\\_safeguard\\_children\\_inter\\_agency\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf)).

**No assurances or guarantees of confidentiality should be given at any stage.**

## 9. Safeguarding adults at risk of harm

9.1 The Care Act statutory guidance also defines adult safeguarding as:

Protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances

(<https://www.scie.org.uk/safeguarding/adults/introduction/what-is>).

9.2 The Care Act 2014 also identifies 10 different types of abuse in relation to adults:

1. Physical abuse
2. Domestic violence or abuse
3. Sexual abuse
4. Psychological or emotional abuse
5. Financial or material abuse
6. Modern slavery
7. Discriminatory abuse
8. Organisational or institutional abuse
9. Neglect or acts of omission
10. Self-neglect

<https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse>

9.3 **Any concerns, allegations or disclosures that can adult at risk of harm may be suffering significant harm should be raised with the Designated Safeguarding Lead (DSL) or Deputy DSL using the form in Appendix 1.** This can be done in person, through a telephone call and or an email marking the subject line 'CONFIDENTIAL – SAFEGUARDING CONCERN/ALLEGATION/DISCLOSURE'. There is a duty of care and legal responsibility to respond to safeguarding concerns, allegations, disclosures and incidents.

9.4 With regards to the consent to share information in the context of adult safeguarding these are the key messages ([www.scie.org.uk](http://www.scie.org.uk)) :

- It is important to share the right information, at the right time, with the right people. This is fundamental to good practice in safeguarding adults.
- It is good practice to try to gain the person's consent to share information. When reporting a concern, allegation or disclosure relating to an adult at risk of harm, please note whether consent was sought and given or sought and not given.

- Information can be shared lawfully within the parameters of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
- The following six safeguarding principles should underpin all safeguarding practice, including information-sharing:
  1. **Empowerment** - People being supported and encouraged to make their own decisions and informed consent.
  2. **Prevention** -It is better to take action before harm occurs.
  3. **Proportionality** -The least intrusive response appropriate to the risk presented.
  4. **Protection** - Support and representation for those in greatest need.
  5. **Partnership** - Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
  6. **Accountability** - Accountability and transparency in safeguarding practice.

**No assurances or guarantees of confidentiality should be given at any stage.**

## 10. Code of Conduct

This code of conduct is primarily for all Salters' staff, Members, and volunteers. It should also, however, be made available to all partners, consultants, freelancers and agencies contracted by the Salters' Group.

It is the duty of everyone involved in the care, education of, and provision of services to children and young people, and adults at risk of harm to:

- promote children's safety, welfare, health and development;
- Identify those children at risk;
- act to prevent abuse and harm; and
- prevent abuse and harm.

The Salters' Group, therefore, asks all individuals and named groups above to adhere to its code of conduct:

1. All must ensure that they have an up-to-date Disclosure and Barring Service (DBS), and where possible register with the update service *if they have regular contact and or are working for sustained periods* with children and young people, and adults at risk of harm. Government guidelines and the [definitions of regulated activity](#) should be used as part of the safer recruitment process at the Salters' Group.
2. To represent the Salters' Group with professionalism, having appropriate, courteous and respectful behaviour, and acting as a positive role model.
3. When communicating and working with external bodies and partners, safeguarding policies must be shared and the contract details of the Designated Safeguarding Lead (DSL) know to all parties.
4. When working off-site and in partnership with other organisations and institutions Salters' staff, Members, and volunteers must also adhere to the local policies and procedures for safeguarding.
5. Salters' staff, Members, and volunteers are expected to attend regular Continuing Professional Development (training in person and or online) to maintain their knowledge and expertise in relation to safeguarding.
6. The behaviour and language of Salters' staff, Members, and volunteers should be, at all times, professional, respectful and unprejudiced.
7. No communications between Salters' staff, Members, and volunteers, whether face-to-face or by phone or online, or information gathered from such communications, shall be passed on to any third party.

8. All must adhere to General Data Protection Regulation (GDPR) guidelines, as prescribed by the Salters' Group. This does not in any way impede the disclosure of any safeguarding concerns.
9. Salters' staff, Members, and volunteers should wear identification when representing the Salters' Group at events and activities onsite at Salters' Hall or offsite at other locations.
10. At institutions and organisations where work is being undertaken on behalf of the Salters' Group, all Salters' staff, Members, and volunteers should ensure that that they are using facilities (bathroom) for visitors.
11. At institutions and organisations where work is being undertaken on behalf of the Salters' Group all Salters' staff, Members, and volunteers should ensure that they sign in upon arrival and sign out upon departure from the institution or organisation.
12. Salters' staff, Members, and volunteers must report any concern, allegation or disclosure of harm and abuse immediately using the appropriate procedures either local to the institution or organisation, or as detailed in this policy.
13. Salters' staff, Members, and volunteers should not be in direct contact with children and young people, and or adults at risk of harm, in any personal capacity and should not seek to arrange personal meetings either in person, over the phone or online. For meetings related to Salters' educational activities and events, Salters' staff should be notified, and good records kept of any such meetings.
14. Salters' staff, Members, and volunteers should ensure that they are never alone 1:1 with children for any activities or events, unless a specific reason has been agreed with the DSL in writing to allow for an exception to this.
15. Salters' staff, Members, and volunteers should work to provide a safe environment for children, young people and adults at risk of harm by not using language or engaging in actions that abusive in any way shape or form. This includes but is not limited to categories of abuse detailed in this policy, bullying, or involving discrimination as detailed in the Equality Act 2010.
16. When working with children, young people or adults at risk of harm, Salters' staff, Members, and volunteers should not allow or engage in suggestive remarks, gestures, or physical contact of any kind that could be misinterpreted as of a sexual, threatening, violent, or otherwise inappropriate nature.

Salters' staff, Members, and volunteers should adhere to this code of practice whether working with children and young people, and or adults at risk of harm in person, over the telephone, mobiles, through other devices, or online.

## **11. Safeguarding and our work**

In the daily work of the Salters' Group all staff, Members, volunteers, partners, consultants, contracted freelancers and agencies will endeavour to safeguard children, young people and adults at risk of harm by:

- reading the safeguarding policy and actively promoting a culture in which safeguarding is paramount;
- adhering to organisational policy and procedures in relation to safeguarding;
- reporting in a timely manner, and without delay, any concerns, allegations or disclosures that a child, young person, or adult at risk of harm is being or is at risk of being abused;
- prioritising the recording and reporting of any concerns, allegations or disclosures;
- following statutory guidance and guidelines on seeking consent to share information;
- providing up-to-date and effective training, supervision, management and support;
- providing commitment and accountability through senior management, organisational and governance leads;
- attending staff training and continuing professional development;
- following and promoting safe recruitment, including DBS checks and references where required; and
- reviewing the policy annually.

## **12. Reporting a concern, allegation or disclosure**

### **A concern**

This is when you or somebody else may have noticed indicators of abuse or neglect and feel that something is not right.

### **An allegation**

This is when somebody tells you that another person has behaved in a way that has harmed a child or adult at risk of harm, or may lead to a child or an adult at risk being harmed. This includes the possibility of somebody committing a criminal offence or planning to commit a criminal offence against a child or an adult at risk of harm. It might also be an indication that somebody is unsuitable for working with children or adults at risk of harm, or another vulnerable group.

### **A disclosure**

This is when somebody shares information that might indicate that they themselves or somebody else is experiencing harm or neglect or is at risk of harm or neglect.

**Any concerns, allegations, or disclosures should be reported immediately to the Acting Designated Safeguarding Lead (DSL).**

**Should the concern, allegation or disclosure relate to the DSL, this should be reported immediately to the Master.**

### **DEALING WITH AN ALLEGATION OR DISCLOSURE**

If a child, young person or adult at risk of harm confides in you that they are being abused or are at risk of harm, you must:

- listen carefully to what they have to say; and
- take immediate and necessary steps to report what you have been told.

#### **DO:**

- ensure that you are in a quiet but public place where you will be uninterrupted;
- tell a colleague where you are;
- stay calm and listen carefully;
- take them seriously;
- offer reassurance;
- ask what the person wants to happen, remembering your duty of care;
- tell the person what you will do next;
- talk to the DSL or Deputy DSL immediately;
- if at an institution or organisation with which the Salters' Group is working, follow local policy and procedure UNLESS the disclosure relates to the Designated Safeguarding Lead at that institution or organisation. In this case, you will have to report the disclosure to another member of the Senior Leadership / Membership Team at the earliest opportunity;



- provide a clear written, contemporaneous record (written at the time that the abuse is noticed or at the time of disclosure) using the child's, young person's or adult's words; and
- sign and date and add the time to every page of any notes or any records made

**DO NOT:**

- promise confidentiality;
- ask leading questions, probe for details, prompt someone or try to establish blame;
- investigate;
- make judgements or express your own feelings (e.g. shock or anger); and
- rush the person making the allegation or disclosure, or interrupt them as they are doing so.

**FOLLOW UP TO AN ALLEGATION OR A DISCLOSURE**

Following the disclosure or allegation of abuse, it is the responsibility of the DSL to assess, record and refer the disclosure, concern or allegation beyond the organisation should it require escalation. This may be done in conjunction with the Clerk (Organisational Lead), Deputy DSL and or Senior Management at a partner organisation or institution. This may also involve the Governance Lead (if the allegation is against a member of Salters' staff, Member or volunteer), City of London & Hackney Safeguarding Children Partnership, or another local authority and, in an emergency, the police.

## 13. Useful Resources

**What to do if you're worried a child is being abused Advice for practitioners March 2015**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What to do if you re worried a child is being abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

**Adverse Childhood Experiences**

[https://www.towerhamlets.gov.uk/Documents/Children-and-families-services/Early-Years/ACES and social injustice DCP SW.pdf](https://www.towerhamlets.gov.uk/Documents/Children-and-families-services/Early-Years/ACES_and_social_injustice_DCP_SW.pdf)

**NSPCC (National Society for the Protection of Children)**

**0808 800 5000**

For adults concerned about a child

<https://www.nspcc.org.uk/>

**Childline**

**0800 1111**

For children and young people

<https://www.childline.org.uk/>

**Action on Elder Abuse Helpline**

**0808 808 8141**

<https://www.elderabuse.org.uk/>

**Stop it Now (Preventing Child Sexual Abuse)**

**0808 1000 900**

24-hour Helpline

<https://www.stopitnow.org.uk/>

**National Domestic Violence Helpline**

**0808 2000 247**

<http://www.nationaldomesticviolencehelpline.org.uk/>

**NAPAC (National Association for People Abused in Childhood)**

**0808 801 0331**

Support and advice for to adult survivors of childhood abuse

<https://napac.org.uk/>

**Sophie Lancaster Foundation**

Support and advice on Hate Crime

<https://www.sophielancasterfoundation.com>

## Appendix 1

Form for reporting an allegation or a disclosure

<b>Date:</b>		<b>Name of person taking the allegation or disclosure and writing this report:</b>	
<b>Time:</b>		<b>Name of person making the disclosure or allegation:</b>	
<b>Location where allegation or disclosure was reported:</b>			
<b>Details of allegation or disclosure:</b>			
<b>Signature of person taking the allegation or disclosure and writing this report:</b>			

Should you need to use additional pages, please sign and date each page.

## Appendix 2

### Agreement and Signature Document

This document should be signed by Salters' staff, Members who hold governance positions, and are office holders, and volunteers.

Full Name:

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Role:

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Enclosed:

- Salters' Group Safeguarding Policy and Procedures including the Code of Conduct

I can confirm I have read and understood the Safeguarding Policy and Procedures, including the Code of Conduct, and will adhere to the guidance and guidelines therein.

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Signature

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Date